

1st March 2011

Optometry Board of Australia
GPO Box 9958
Melbourne Vic 3001

Dear Sirs,

Re: Proposal for therapeutic qualification to be included as a requirement for registration.

Preamble:

I support the proposal that overseas trained optometrists should meet the same therapeutic competency standards as Australian graduates.

However I am strongly opposed to the proposal that existing “established” optometrists must have therapeutic endorsement as a condition of their registration.

Comments:

This proposal implies that there is a public risk if optometrists are not all therapeutically trained. Nothing could be further from the truth. In the current two-tier system, only 20% of registered optometrists have therapeutics. Aside from new graduates, a large number of this 20% are in academia, administration, and research positions. The reality is that over 90% of practicing clinical optometrists have not endorsed therapeutic training.

The reasons for the lack of acceptance of therapeutics by the general optometry workforce include:

- 1) Established and effective referral arrangements with local GP’s and ophthalmologists. The vast majority of optometric services are provided in suburban and city regions where access to medical services is not limited.
- 2) Access to therapeutic training, cost of training, time away from Practice and family versus dubious benefit to patients.
- 3) Cost to patient of prescribed therapeutic agents
- 4) Risk to patient of incorrect diagnosis and treatment. Postgraduate therapeutic training is not sufficiently comprehensive to meet medical safety levels. Infact the risk to patients is greater in the case of poorly applied training.
- 5) Lack of evidence of problems and/or risks with the current system. There is no evidence to support the notion that the current two-tier system of patient care is flawed or a risk to public health and safety.
- 6) The Rural optometrist special case: Clearly in some areas there is limited access to ophthalmological services. In these instanced therapeutic training has been valuable for these optometrists. This does not however extrapolate to every other optometrist.
- 7) It is not a reasonable expectation of established optometrists to be compulsorily therapeutically endorsed.

In my own case, I have been a solo practitioner in my current location for 26 years. I have excellent “first name” relationships with all the local GP’s (25 within a 1 km radius) and ophthalmologists (10 within a 3 km radius). They are able to see patients urgently if required. Over these years not one patient has suffered or been treated incorrectly.

Why would I undertake extra training which

- is un-necessary for my patients and my practice
- would compromise my relationships with local medico’s
- I would never use
- I don’t have time for
- I can’t justify the cost of
- I am fundamentally opposed to ?

- 8) A period of grace is not appropriate, as existing established optometrists should never be required to undergo therapeutics. Specifically, a period of grace would force many experienced, skilled and respected optometrists to retire prematurely. How would such a date be decided, on what grounds, based on what research and evidence, and by whom? I do not consider that my peers or any other body should determine the terms or date of my retirement from this profession.
- 9) Overseas trained optometrists applying for registration in Australia are making a conscious choice to come and work in this country. They should be subject to the same registration requirements as new Australian graduates.
- 10) Non-clinical optometrists should not be required to hold therapeutic qualifications as a condition of their registration.
- 11) The impediments to this proposal include the obvious lack of support from “grass roots” optometry – over 90% of optometry has chosen NOT to undertake therapeutic training.

Conclusion:

Neither the public nor the profession has been disadvantaged by the current “two-tier” system of optometry practice, which has existed for over 5 years.

When I graduated in 1981, it was never expected that my Registration could become conditional on further training. I strongly caution the OBA against alienating the majority of optometrists in this matter.

Yours sincerely

Bill Cutler Optometrist